

From Wayne's April 13 Email		DAS Comments
1. Latest version of Curfew 24c label approved 3/15/10.		Most recent Florida approval was for the Supplemental SLN dated 3/15/2010. In use since that time.
2. Latest version of Curfew cylinder label approved 3/15/10.		The cylinder label was not revised at this time, but was approved since the labeling has 2 pieces (cylinder and supplemental).
3. DAS requested cylinder revision to 3/15/10 label in order to bring it into alignment with other Section 3 Telone/Inline labels (uniformity purposes for DAS)		Key need is to align Curfew Cylinder Label with current Telone II label and compliance with PCC
4. Changes comply with new PC&C regulations.		Yes, this is a key driver for the current deadline for implementation - Aug. 16, 2011
5. Changes were inserted from existing Telone II and 24 c Curfew label, as noted on copied labels.		Yes, the changes on the cylinder are important to align with with the supplemental
6. Telone II label insertions into cylinder label were included into PPE, cautionary statements, engineering controls, storage and disposal, physical & chemical sections...see notated label.		Even though overall changes are minor from a functional perspective, some revisions were made in each of these sections.
7. Curfew label insertions into cylinder label were included into entry restrictions, notification of employees and non-employees, buffer zones sections...see notated label.		Yes, okay.
8. The term "agricultural pesticides" use in various label sections does not apply to Curfew usage...pgs. 2,3,5, label, pgs. 10, 13 booklet.		1. in reference WPS, we need to keep the term ag use. 2. Environmental Hazard Statement: boiler plate; cause EPA review/approval and delay; still, the statement is factual and turf uses poses minimal risk to groundwater. 3. Do not ship, etc. suggest removal of the word Agricultural Chemical.
9. Question concerning end row spillage devices ...pg 4 label, pg. 11 booklet.		Identical to Telone II...need to keep as-is
10. Question concerning contact with mouth ...pg.4 label, pg. 12 booklet.		Open to some modification that will also be proposed on upcoming Telone II label amendment.
11. Question in Application Rate Section: Is the statement customary to refer to state and county authorities to obtain label? According to DAS, it makes various shipment label more uniform without mis-labeling concerns.		Key need to reference state-specific SLNs.
12. Question in Warranty Section: Is.. "to the extent allowable by law" clause needed? According to DAS, that is a variable EPA decision upon their final review.		DAS has approval for..."to the extent permitted by law..." and it is our policy that EPA must ask for it before we will do it.
13. Previous comment under Engineering Controls concerning the use of "upstream" instead of "above" the orifice...pg. 4 label, pg. 11 booklet.		Prefer no change so that there is consistency with Telone II.
14. This was a previous CM observation: Under "Personal Protective Equipment", sections 2 and 3 it reads: "A respirator is not required if the occupants are within an enclosed cab that is in conformance with one of the following: 1) ANSI/ASAE S525-1.1 MAY98 sections 7.1.5, 7.1.7, 7.2.3, and 9, or 2) the requirements listed in the Worker Protections Standard (WPS) for agricultural pesticides – 40 CFR 170.240 (d)(5). The cab must be equipped with a vapor-adsorptive filter containing a minimum of 1000 grams activated charcoal. The filter must be changed after no more than 50 hours of application time." In cases where the enclosed cab is used in lieu of a respirator, FDACS would need to verify that the cab system meets one of the standards quoted above. For enforcement purposes, we would prefer that documentation supporting the system's conformance with the listed standards be kept by the applicator and be made available to FDACS upon request. We recommend modifying the language on the label, by adding a documentation requirement. Ex: A respirator is not required if the occupants are within an enclosed cab for which supporting documentation is available showing that the cab is in conformance with one of the following...		DAS agrees with this approach...need to gain agreement with Dave B.